

Exhibit 1

COPY

IN THE SUPERIOR COURT OF BIBB COUNTY
STATE OF GEORGIA

TAMELIA LATTIMORE,
Plaintiff,

vs.

PETSMART INC.,
Defendant.

CIVIL ACTION NO.:

14CV61923

SUMMONS

TO THE ABOVE NAME DEFENDANT:

You are hereby summoned and required to file with the Clerk of said Court and serve upon

James W. Davis
Attorney at Law
143 Lamar Street
Macon, Georgia 31204

an answer to the Complaint which is herewith served upon you within thirty (30) days after service of this Summons upon you, exclusive of the day of service. If you fail to do so, judgement by default will be taken against you for the relief demanded in the Complaint.

This 12th day of November, 2014.

Barbara S. Hamm
Dep. CLERK OF COURT

54206

Civil Action No. 14CV61923Date Filed 11/12/14

Civil Court ☐

Superior Court ☒

State Court ☐

Magistrate Court ☐

Georgia, Bibb COUNTY

Attorney's Address Lawrence Associates
143 Lamar Street
Macon, GA 31204

Tamela Laffimore

Plaintiff

VS.

Petsmart, Inc

Name and Address of Party to be Served

Cooperation Process Company
Registered Agent of Petsmart, Inc
2180 Satellite Blvd, Ste. 400
Duluth, GA, 30097

Defendant

Garnishee

SHERIFF'S ENTRY OF SERVICE

I have this day served the Garnishee _____ by leaving a copy of the
 within action and summons with _____

☐ I have this day served the defendant _____ personally with a copy
 of the within action and summons.

☐ I have this day served the defendant _____ by leaving
 a copy of the action and summons at his most notorious place of abode in this County.

☐ Delivered same into hands of _____ described as follows
 age, about _____ years; weight, about _____ pounds; height, about _____ feet and _____ inches, domiciled at the residence of
 defendant.

☒ Served the defendant Dr. S. H. ... a corporation
 by leaving a copy of the within action and summons with L. ...
 in charge of the office and place of doing business of said Corporation in this County.

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door
 of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of same in the
 United States Mail, First Class in an envelope properly addressed to the defendant(s) at the address shown in said summons,
☐ with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in
 the summons.

Diligent search made and defendant _____
 not to be found in the jurisdiction of this Court.

☐ This 19 day of Nov, 2014

⑥ 1628 AM

Shirley S. ...
Deputy

SHERIFF DOCKET _____ PAGE _____

COUNTY, GEORGIA

WHITE: Clerk

CANARY: Plaintiff Attorney

PINK: Defendant
 or
 Garnishee

IN THE SUPERIOR COURT OF BIBB COUNTY
STATE OF GEORGIA

FILED
CLERK'S OFFICE

2014 NOV 12 AM 9:32

TAMELIA LATTIMORE,
Plaintiff,

vs.

PETSMART INC.,
Defendant,

CIVIL ACTION NO.:

ERIC A. HENDERSON, CLERK
SUPERIOR COURT
BIBB COUNTY, GEORGIA
14CV61923

COMPLAINT

COMES NOW Tamelia Lattimore, plaintiff herein, by and through her undersigned attorney, and files this her complaint and shows this court the following:

Parties, Jurisdiction, Venue

(1)

The defendant, PetSmart Inc., is a non-resident corporation that transacts business in Macon, Georgia and is subject to the personal jurisdiction of this court under O.C.G.A. 9-10-91. The defendant is subject to service with its registered agent, Corporation Process Company, at 2180 Satellite Boulevard Suite 400, Duluth, Georgia, 30097.

(2)

Venue is proper in this court on the basis that the tortious acts were committed at 4551 Billy Williamson Dr. Macon, GA 31206, in Bibb County.

Statement of Facts

(3)

The plaintiff was an employee of PetSmart Inc., and was employed as a lead cashier and had been employed for eighteen years.

(4)

The plaintiff was targeted for termination in an effort to get rid of a costly employee and

James W. Davis

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replace the plaintiff with a less expensive employee.

(5)

On December 19, 2013, the plaintiff was accused of stealing a one hundred dollar bill on November 29, 2013.

(6)

Plaintiff was taken to the store manager's office and unreasonably interrogated for more than 30 minutes by two PetSmart officials, the District Manager and the Loss Prevention Officer.

(7)

The plaintiff was made to believe that she would lose her job if she did not confess to stealing the one hundred dollar bill. The plaintiff also believed that the interrogation and detainment would not end unless she signed a confession.

(8)

The plaintiff wrote a confession at the direction of the Loss Prevention Officer.

(9)

As a result of the confession which the plaintiff was forced to write, the store manager terminated the plaintiff.

(10)

As a result of the foregoing intentional conduct of the PetSmart officials, the plaintiff suffered mental stress.

(11)

As a result of the actions of PetSmart employees acting within the scope of their employment, PetSmart has committed the torts of intentional infliction of mental distress, false imprisonment, and false arrest.

(12)

In that the actions taken against the plaintiff showed willful misconduct, malice, fraud, wantonness, oppression and an entire want of care, punitive damages pursuant to O.C.G.A. 51-


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12-5.1 should be awarded in this case in an amount to be determined in the bifurcated stage of the trial in an amount to be determined by a jury.

Wherefore the plaintiff prays that this matter be set down for a jury trial in Bibb Superior Court whereby the issues may be determined by a jury to determine the amount of damages, along with punitive damages pursuant to O.C.G.A. 51-12-5.1, caused by the defendant in an amount to be determined by that jury.

This 30th day of October, 2014


James W. Davis
Attorney for Plaintiff
GA State Bar # 210309

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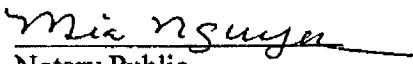
CIVIL ACTION NO.: _____

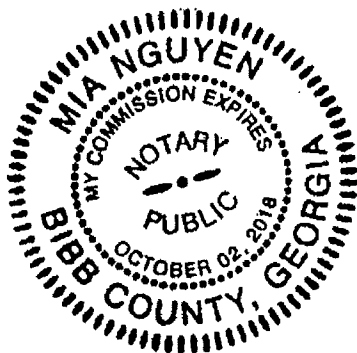
VERIFICATION

Personally appeared before the undersigned officer authorized by law to administer oaths, the deponent herein, on oath, deposes and says that the facts contained in the foregoing document are true and correct.


Tamelia Lattimore
Plaintiff

Sworn to and subscribed before me this
30th day of October, 2014.


Notary Public
My Commission Expires: 10/2/18



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